

STATE OF TENNESSEE

Office of the Attorney General



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Reply to:  
Consumer Advocate and Protection Division  
Post Office Box 20207  
Nashville, TN 37202

November 3, 2003

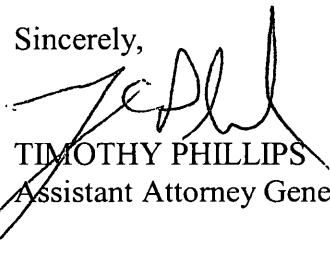
Honorable Deborah Taylor Tate  
Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

IN RE: IMPLEMENTATION OF THE FEDERAL COMMUNICATIONS  
COMMISSION'S TRIENNIAL REVIEW ORDER-9 MONTH PROCEEDING-LOOP  
AND TRANSPORT, TRA DOCKET 03-00527

Dear Chairman Tate:

Enclosed is an original and thirteen copies of the Consumer Advocate and Protection Division's Petition To Intervene in Docket No. 03-00527. Kindly file same in this docket. Copies are being sent to all parties of record. If you have any questions, kindly contact me at (615) 741-3533. Thank you.

Sincerely,

  
TIMOTHY PHILLIPS  
Assistant Attorney General

cc: All Parties of Record

#66649

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**IN RE:**

**IMPLEMENTATION OF THE  
FEDERAL COMMUNICATIONS  
COMMISSION'S TRIENNIAL REVIEW  
ORDER - 9 MONTH PROCEEDING -  
LOOP AND TRANSPORT**

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**DOCKET NO. 03-00527**

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**PETITION TO INTERVENE**

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Comes now Paul G. Summers, the Attorney General and Reporter for the State of Tennessee, through the Consumer Advocate and Protection Division of the Office of Attorney General (hereinafter "Consumer Advocate"), pursuant to Tenn. Code Ann. § 65-4-118(c)(2)(A) and Rule 1220-1-2-.08 of the Tennessee Regulatory Authority (hereinafter "TRA"), and petitions the TRA to grant the Consumer Advocate's intervention in this proceeding on behalf of consumers and in the public interest. For cause, the Consumer Advocate would show unto the TRA as follows:

1. In order to represent the interests of Tennessee consumers, the Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118(c)(2)(A) to initiate a contested case and to intervene or participate in proceedings concerning public utility matters in accordance with the Uniform Administrative Procedures Act.

3. The release of the Triennial Review Order by the Federal Communications Commission on August 21, 2003 has triggered this proceeding, which will consider a number of issues related to Tennessee's telecommunications market.

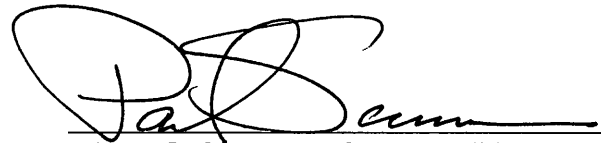
4. On October 27, 2003, Director Pat Miller, as Hearing Officer, issued an order establishing a procedural schedule for this matter which directed interested persons to file petitions to intervene by November 3, 2003.

5. The findings and determinations of this proceeding will affect the interests of the consumers of Tennessee.


6. Only by intervening and participating in this proceeding can the Consumer Advocate work effectively to protect the interests of Tennessee consumers.

WHEREFORE, the Consumer Advocate prays that the TRA grant the Consumer Advocate's timely filed Petition to Intervene and allow the Consumer Advocate to participate as a party to this proceeding.

RESPECTFULLY SUBMITTED,



PAUL G. SUMMERS, B.P.R. #6285  
Attorney General and Reporter

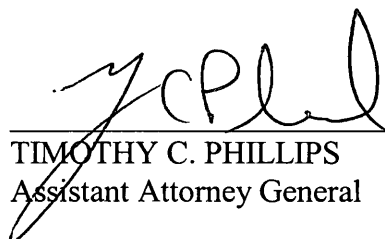


TIMOTHY C. PHILLIPS, B.P.R. #12751  
Assistant Attorney General  
Office of the Attorney General  
Consumer Advocate and Protection Division  
P.O. Box 20207  
Nashville, Tennessee 37202-0207  
(615) 741-8700

Dated: November 3, 2003

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Petition to Intervene was delivered via electronic mail to interested parties on November 3, 2003.



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TIMOTHY C. PHILLIPS  
Assistant Attorney General

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